



Declaration under 37 CFR 1.132

I, Isao Hayami, declare as follows:

1. I am a citizen of Japan, who resides in Japan.
2. I have earned and been awarded a Bachelor Degree in Engineering by Kyoto Institute of Technology in March of 1991. Since April of 1991, I have been employed by Minolta Camera Co., Ltd., a former body of Konica Minolta Technology Center, Inc. where I have been engaged in patent affairs, including Japanese and foreign patent applications and prosecutions in the field of image processing, image communication, copier, printer, digital camera, liquid crystal display device, and image sensor. I have also earned and been awarded a Degree of Legum Magister (Master of Law) by University of Washington School of Law in June of 2004.
3. I have read the United States Patent No. 6,809,741, Bates et al, and have understood the technical Information thereof.
4. In Bates et al, the term "text object" is defined so that this term can be meant to encompass any text, including foreign language text, which can be colored, such as hypertext links, bold text, blinking text, Italicized text, etc (Column 6, Lines 62 through 65), and can be meant to encompass groups of text (Column 6, Line 62 thorough Colum 7, Line 2).
5. In referring to Fig. 2 of Bates et al, this patent explains that within the centered text object 245 on a table background 240 are two text objects, a hyperlink 250 and an italicized portion 241. It is also explained that the hyperlink 250 and the italicized portion 241, which constitute part of the centered text object 245, are preferably treated as separate objects so that they can each be assigned a color. (Column 7, Lines 10 through 16)
6. Bates et al refers to the method 300 of Fig. 3, in which a color combination of each background object and each foreground object is examined to determine such color combination is problematic or not. In Step 311, where a

foreground object is selected, the text object 245 mentioned above is again referred to as an example (Column 12, Lines 30 through 45). Although the hyper text object 250 and italicized text object 241 are explained to be within the centered text object 245 as mentioned above and have different colors from that of the centered text object 245 as explained in Column 12, Line 33, the color of text object 245 is determined to be black (Column 12, Lines 43 through 45). Thus, the centered text object 245 is determined to have only a single color.

7. From the teachings mentioned in the above items 4 through 6, I understood that, at least for the purpose of text object's color determination, Bates et al treats the part of text object 245 that is colored black as a single object and is separated from the different colored hypertext object 250 and the different colored italicized text object 241. I further understood that, at least for the purpose of text object's color determination, the whole of the centered text object 245, which includes the hypertext object 250 and the italicized text object 241, is not treated as a single object when the objects 245, 250, and 241 have different colors. I believe each single text object chosen in the Step 311 cannot have multiple colors but a single color.
8. The single colored text object chosen in Step 311 as a foreground object is subject to the Step 320, which is explained in detail referring to the method 500 of Fig. 5. Because each text object chosen in Step 311 of Fig. 3 should have a single color as mentioned above, the method 500 of Fig. 5 will be performed to trace Steps 510, 530 and 520 for each chosen text object. Therefore, Steps 540 through 590 of Fig. 5 cannot be performed for any foreground to the extent that such foreground is text object, according to the disclosure of Bates et al.
9. I further declare that all statements made herein of my own knowledge are true and that all statements made upon information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States

Code, and that such wilful false statements may jeopardize the validity of the application or any patent issuing thereon.

Executed on this 25th day of October, 2007.

By: 
Isao Hayami